

ORIGINAL to ca w/o
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

96
4/29/02
JE

Christopher LEWIS; : CIVIL ACTION LAW
Plaintiff :
v. :
Dominick DEROSE, Mark Jexzenka, : (RAMBO, J.)
Michael Hohney, Robert Drum, Shoemaker : (SMYSER M.J.)
Carl Garver, and Dauphin County; :
Defendants : JURY TRIAL DEMANDED

FILED
HARRISBURG

APR 26 2002

MARY E. D'ANDREA, CLERK
Per 96
DEPUTY CLERK

To the United States District Court for the Middle District of Pennsylvania

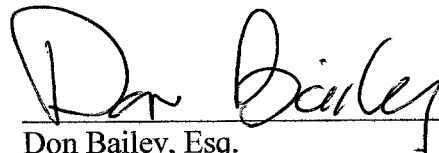
PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

AND NOW COMES Plaintiff Christopher Lewis, by his counsel Don Bailey, Esq., who respectfully moves this Court for enlargement of time to file Brief in opposition to Defendant's motion for Summary Judgment and in support thereof, avers:

1. On or about April 26, 2002, Plaintiff's Brief in Opposition to Defendant's Motion for Summary Judgment would be due.
2. Counsel has been out of the office on two mandatory CLE classes during last week and is respectfully requesting an enlargement.
3. Opposing counsel Frank Lavery, Esquire was contacted by telephone and concurs with this motion.
4. Plaintiff is requesting until Monday, April 29, 2002 to file his response to Defendants' Summary Judgment motion.

WHEREFORE, this Court is respectfully requested to grant Plaintiff's motion for enlargement of time until Monday, April 29, 2002 to file his response to Defendant's summary judgement motion, and for such other and additional relief as may be just and proper.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Don Bailey", is written over a horizontal line.

Don Bailey, Esq.

Pa. I.D. No. 23687

4311 North Sixth Street

Harrisburg, PA 17110-1614

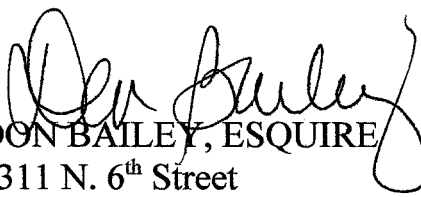
717-221-9500

April 24, 2002

CERTIFICATE OF SERVICE

I DON BAILEY, ESQ. do hereby certify that on this date I caused to be served the foregoing **MOTION FOR ENLARGEMENT OF TIME** by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA, addressed to the following:

FRANK LAVERY ESQ.
333 MARKET STREET
HARRISBURG, PA 17101


DON BAILEY, ESQUIRE
4311 N. 6th Street
Harrisburg, PA 17110
(717) 221-9500

DATED: April 24, 2002